

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

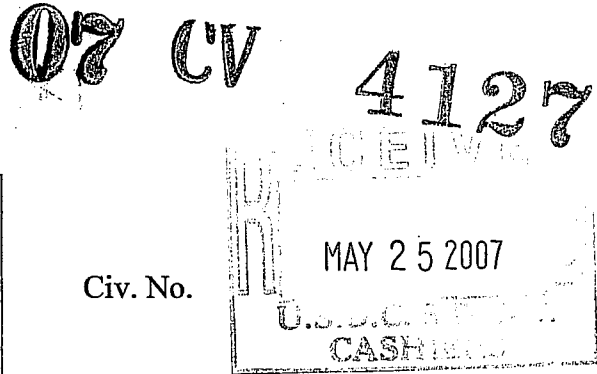
DB STRUCTURED PRODUCTS, INC.

Plaintiff,

-against-

IFREEDOM DIRECT CORPORATION,  
f/k/a NEW FREEDOM MORTGAGE  
CORPORATION

Defendant.



Civ. No.

**STATEMENT PURSUANT TO RULE 7.1**  
**OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel of record for Plaintiff DB Structured Products, Inc., states as follows:

Defendant DB Structured Products, Inc. is wholly owned by DB U.S. Financial Markets Holding Corporation, a Delaware Corporation which is wholly owned by Taunus Corp., which is wholly owned by Deutsche Bank AG, which is a publicly held corporation.

Dated: New York, New York  
May 25, 2007

THACHER PROFFITT & WOOD LLP

By: John P. Doherty  
John P. Doherty (JD-8275)  
Richard F. Hans (RH-0110)  
Kerry Ford Cunningham (KF-1825)  
Brendan E. Zahner (BZ-8645)  
Two World Financial Center  
New York, New York 10281  
(212) 912-7400

*Attorneys for DB Structured  
Products, Inc.*